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Ivan M. Ivan, Chairperson Myron P. Naneng, Sr., President Phone (907) 543-7300 Fax (907) 543-3369 AVCP

The Association of Village Council Presidents Office of Administration Pouch 219, Bethel, AK 99559



June 24, 2004

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Crooked Creek

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Henri Bisson State of Alaska Director Bureau of Land Management, Alaska State Office 222 West 7<sup>th</sup> Avenue Anchorage, Alaska 99513-7599

Dear Mr. Bisson:

I am writing you as President of the Association of Village Council Presidents, the Alaska Native regional nonprofit for the Yukon-Kuskokwim Delta, to request that BLM hold a hearing in Bethel and at least one village on its decision to revisit its 1998 plan for the Northeast Planning Area of the National Petroleum Reserve-Alaska.

AVCP has been involved in migratory bird co-management and conservation for over twenty years. Migratory birds are a critical part of our people's subsistence and culture. Black brant, in particular, have been a species of concern here on the Y-K Delta, which AVCP and our villages have been active in co-managing for conservation. We are concerned that the possible opening of the Teshekpuk Lake area to oil exploration and development might adversely affect black brant populations here on the Delta. Banding studies suggest that nearly 70% of the black brant in the Teshekpuk Lake area may be brant that nest here in the Y-K Delta. In 1998, the Teshekpuk Lake Special Area was omitted from the remainder of the Northeast Planning Area when the remainder of the Planning Area was opened to the oil industry, specifically because of its ecological value.

We therefore request that a hearing be held in Bethel on this decision to revisit the 1998 plan. For our part, we will do all that we can to ensure that people in our coastal villages get word of this meeting, and have an opportunity to comment at such a hearing, although we believe it would also be important for BLM to widely publicize such a meeting in the region's newspapers and radio station, and to accommodate toll free callins from the villages. We would also suggest that BLM hold at least one hearing in a coastal village located near prime black brant nesting areas.

We further request that the comment period be extended past the August 2<sup>nd</sup> Deadline. Summer is the peak of the subsistence season, and more time to comment would allow greater input by affected people here in our region.

hank you,

Myron P. Naneng,

President

Association of Village Council Presidents